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August 26, 2020

VIA CM/ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
Courtroom 14A
New York, NY 10007-1312

Re: *Brown v. DriveSmart Auto Care Inc.*, No. 1:20-CV-05744

Dear Judge Koeltl:

Pursuant to Individual Practice Rule I.E., and with the consent of counsel for Plaintiff Jeffrey Brown, I submit this letter-motion on behalf of Defendant DriveSmart Auto Care Inc. (“Defendant” or “DriveSmart”) to request an extension of time by which Defendant may answer, move, or otherwise respond to the Complaint in this matter for a period of 30 days, up to and including September 25, 2020. DriveSmart’s original deadline to answer, move, or otherwise respond to the Complaint was August 26, 2020, and this is the first and only request for an adjournment or extension submitted by either party in this matter. Counsel for Defendant has conferred with counsel for Plaintiff Brown, and counsel for Plaintiff Brown has advised that Plaintiff Brown consents to the relief requested herein. The requested adjournment does not affect any other scheduled dates. Therefore, Defendant respectfully requests that the Court grant an extension of the deadline for it to answer, move, or otherwise respond to the Complaint for a period of 30 days, up to and including September 25, 2020.

Respectfully submitted,

/s/ A. Jeff Ifrah

A. Jeff Ifrah

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Cc: Counsel of Record (Via CM/ECF)